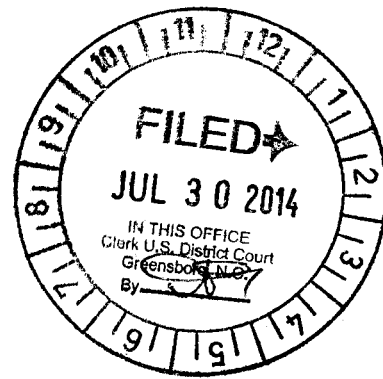


IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA



UNITED STATES OF AMERICA :
 :
 v. : 1:14CR 308 -1
 :
 SARAH EURY FARRELL :

The United States Attorney charges:

COUNT ONE

From on or about April 23, 2008, continuing up to and including on or about May 18, 2008, the exact dates unknown, in the County of Moore, in the Middle District of North Carolina, and elsewhere, SARAH EURY FARRELL engaged in a practice and pattern of referring for employment in the United States for a fee certain aliens, that being aliens with the initials E.C.G., J.C.G., C.E.M., A.E.M., M.G.R., E.L.S., O.L.L., R.E.R.T. and O.T.M., knowing that said aliens were unauthorized aliens as defined at Title 8, United States Code, Section 1324a(h)(3), with respect to such employment.

All in violation of Title 8, United States Code, Sections 1324a(a)(1)(A) and 1324(f)(1).

COUNT TWO

From on or about March 24, 2009, continuing up to and including on or about April 3, 2009, the exact dates unknown, in the County of Moore, in the Middle District of North Carolina, and elsewhere, SARAH EURY FARRELL engaged in a practice and pattern of referring

for employment in the United States for a fee certain aliens, that being aliens with the initials T.P.S., J.L.P.S. and J.M.R.P., knowing that said aliens were unauthorized aliens as defined at Title 8, United States Code, Section 1324a(h)(3), with respect to such employment.

All in violation of Title 8, United States Code, Sections 1324a(a)(1)(A) and 1324(f)(1).

FORFEITURE

1. The allegations contained in Counts One and Two of this Bill of Information are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 8, United States Code, Section 982(a).

2. Pursuant to Title 8, United States Code, Section 1324(b)(1), upon conviction of offenses in violation of Title 8, United States Code, Section 1324a, as alleged in Counts One and Two, the defendant shall forfeit to the United States of America any conveyance, including any vessel, vehicle or aircraft, that has been or is being used in the commission of the violations of which the defendant is convicted, the gross proceeds of such violations, and any property traceable to such conveyance or proceeds.

3. Pursuant to Title 18, United States Code, Section 982(a)(6), upon conviction of offenses in violation of Title 8,

United States Code, Section 1324(a), as alleged in Counts One and Two, the defendant shall forfeit to the United States of America:

(a) any conveyance, including any vessel, vehicle, or aircraft used in the commission of the offense of which the defendant is convicted; and

(b) any property, real or personal--

i. that constitutes, or is derived from or is traceable to the proceeds obtained directly or indirectly from the commission of the offense of which the defendant is convicted; or

ii. that is used to facilitate, or is intended to be used to facilitate, the commission of the offense of which the defendant is convicted.

4. The property to be forfeited may include a money judgment against the defendant in an amount representing the total amount forfeitable as a result of the offenses of which the defendant is convicted.

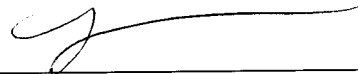
5. If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to or deposited with,

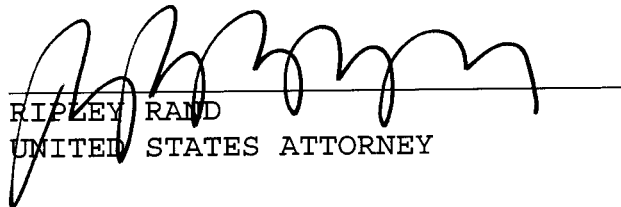
a third party;

- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty, the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c).

All pursuant to Title 8, United States Code, Section 1324(b)(1), Title 18, United States Code, Section 982(a)(6), Rule 32.2(a), Federal Rules of Criminal Procedure, and Title 28, United States Code, Section 2461(c).



FRANK J. CHUT, JR.
ASSISTANT UNITED STATES ATTORNEY



RIPLEY RAND
UNITED STATES ATTORNEY